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- and -

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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NOTICE OF PRESENTMENT OF JOINT STIPULATION AND AGREED ORDER IN
RESPECT OF DEBTORS' CLAIMS ESTIMATION MOTION AND THIRD OMNIBUS
OBJECTION TO CLAIMS OF CADENCE INNOVATION LLC

PLEASE TAKE NOTICE that on October 31, 2006, Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), objected to proof of claim numbers 10100 ("Proof of Claim 10100") and 10111 ("Proof of Claim 10111" and, together with Proof of Claim 10100, the "Proofs of Claim") filed by Cadence Innovation LLC (the "Claimant") pursuant to the Debtors' (i) Third Omnibus Objection (Substantive) Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (a) Claims With Insufficient Documentation, (b) Claims Unsubstantiated By Debtors' Books And Records, And (c) Claims Subject To Modification And (ii) Motion To Estimate Contingent And Unliquidated Claims Pursuant To 11 U.S.C. § 502(c) (Docket No. 5452) (the "Third Omnibus Claims Objection").

PLEASE TAKE FURTHER NOTICE that the Debtors and the Claimant have agreed, among other things, to settle the Third Omnibus Claims Objection with respect to the Proof of Claim and have agreed on the terms of a (i) Settlement Agreement dated as of November 26, 2007 (the "Settlement Agreement") and (ii) Joint Stipulation And Agreed Order In Respect Of Debtors' Claims Estimation Motion And Third Omnibus Objection To Claims Of Cadence Innovation LLC (the "Joint Stipulation") attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Settlement Agreement and the Joint Stipulation, the Debtors and the Claimant propose, among other things, to (i) consolidate, for administrative convenience only and without prejudice to the Claimant's rights against any of the Debtors, the Proofs of Claim into Proof of Claim 10100, (ii) expunge Proof of Claim 10111, (iii) allow Proof of Claim 10100 as a general unsecured non-priority claim in the amount of \$3,750,000.00, and (iv) withdraw the Response Of Cadence Innovation LLC To Debtors' Third Omnibus Objection To Claims (Docket No. 5769) with prejudice.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Amended And Restated Order Under 11 U.S.C. §§ 363, 502 And 503 And Fed. R. Bankr. P. 9019(b) Authorizing Debtors To Compromise Or Settle Certain Classes Of Controversy And Allow Claims Without Further Court Approval (Docket No. 8401) (the "Settlement Procedures Order"), the Debtors have provided the Notice Parties (as defined in the Settlement Procedures Order) with notice of the terms of the proposed settlement with the Claimant.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Settlement Procedures Order, if counsel to the Debtors does not receive a written objection or written request for additional time from any of the Notice Parties by December 10, 2007, then the Debtors will consummate the Settlement Agreement and will present the Joint Stipulation for consideration at the hearing scheduled for December 11, 2007, at 10:00 a.m. (prevailing Eastern time) in the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
November 29, 2007

SKADDEN, ARPS, SLATE, MEAGHER &
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